### IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA AT CHARLESTON

IN RE ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION

Master File No. 2:12-MD-02327 MDL 2327

THIS DOCUMENT RELATES TO:

ETHICON WAVE 6 CASES LISTED IN EXHIBIT A

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

#### <u>DEFENDANTS' NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE OF</u> STEVEN GOLDWASSER, M.D. FOR WAVE 6

Plaintiffs filed a Notice of Adoption (ECF No. 4801) in the Wave 6 cases identified in Exhibit A to their Notice, adopting their Motions to Exclude Expert Testimony of Steven Goldwasser, M.D., ECF No. 3677 ("Plaintiffs' Wave 4 Motion") and ECF No. 4365 (Plaintiffs' Wave 5 Motion").

Defendants hereby adopt and incorporate by reference their prior *Daubert* responses in ECF No. 3754 ("Defendants' Wave 4 Response") and ECF No. 4553 ("Defendants' Wave 5 Response")

Respectfully submitted,

November 6, 2017

/s/ Christy D. Jones

Christy D. Jones Butler Snow LLP

1020 Highland Colony Parkway

Suite 1400 (39157)

P.O. Box 6010

Ridgeland, MS 39158-6010

(601) 985-4523

christy.jones@butlersnow.com

/s/ David B. Thomas

David B. Thomas (W.Va. Bar #3731) Thomas Combs & Spann PLLC

300 Summers Street Suite 1380 (25301) P.O. Box 3824

Charleston, WV 25338

(304) 414-1807

dthomas@tcspllc.com

## /s/ Kelly S. Crawford

Kelly S. Crawford Riker Danzig Scherer Hyland & Perretti, LLP Headquarters Plaza One Speedwell Avenue Morristown, NJ 07962-1981 (973) 451-8417 kcrawford@riker.com

COUNSEL FOR DEFENDANTS ETHICON, INC. AND JOHNSON & JOHNSON

# EXHIBIT A

	WAVE 6 CASE NAME	CASE NO.
1.	Karrie Ward v. Ethicon, Inc., et al.	2:12-cv-08928
2.	Debora Wing v. Ethicon, Inc., et al.	2:13-cv-01464
3.	Karen Heath v. Ethicon, Inc., et al.	2:13-cv-01750

### **CERTIFICATE OF SERVICE**

I hereby certify that on November 6, 2017, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Kelly S. Crawford
Kelly S. Crawford

4896014v1